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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA CHESS
FEDERATION, INC., an Illinois not-for-profit
corporation, RANDAL D. HOUGH, an
individual

Plaintiffs,

v.

SUSAN POLGAR, an individual, GREGORY
ALEXANDER, an individual, and DOES 1-
20, inclusive,

Defendants.

SUSAN POLGAR

Counter-Plaintiff,

v.

BILL GOICHBERG, BILL HALL, RANDY
BAUER, JIM BERY, KARL
KRONENBERGER,

third party defendants,

RANDALL HOUGH,

Counter-Defendant.

No. 3:08-cv-05126-MHP

**DECLARATION OF RANDY BAUER IN
SUPPORT OF COUNTER-DEFENDANTS
BAUER, HALL, GOICHBERG, AND
BERRY'S MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION**

Date: September 28, 2009

Time: 10:00 a.m.

Ctrm: 15, on the 18th Floor

Judge: The Hon. Marilyn Patel

No. 3:08-cv-05126 USCF v. Polgar

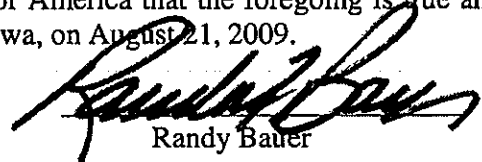
Declaration of Randy Bauer in Support of Counter-Defendants' 12(b)(2) Motion for Dismissal for
Lack of Personal Jurisdiction

1 I, Randy Bauer, declare:

2 The following is of my own personal knowledge, unless stated under information and
3 belief, and if called as a witness I would testify as follows:

- 4
- 5 1. At the time the lawsuit and counter-claims were filed I was on the Board of
- 6 Directors and the Vice President of Finance for the non-profit United States
- 7 Chess Federation ("USCF"). This is a volunteer position for which I spent about
- 8 7 hours per week. Professionally, I am a Director of State Strategic Consulting
- 9 for Public Financial Management, Inc., a national financial and advisory firm to
- 10 governments and non-profit organizations.
- 11
- 12 2. I have resided, as my primary domicile, in Iowa for the past twenty-two
- 13 consecutive years. I have never resided in California.
- 14
- 15 3. I have travelled to California about seven times since 1983 for personal vacation
- 16 or business unrelated to USCF. I traveled to California once in 2003 or 2004 for
- 17 a USCF Board of Director's meeting. These meetings are held throughout the
- 18 nation, with no more frequency in California.
- 19
- 20 4. To my knowledge, the USCF does not perform any business in California, with
- 21 the exception of dealing with other chess clubs that happen to be located in
- 22 California and/or chess tournaments that are held in California. None of these
- 23 factors occur more in California than the other states.

24 I declare under the laws of the United States of America that the foregoing is true and
25 correct. Executed at Polk County, Iowa, on August 21, 2009.

26 

27 Randy Bauer